

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*

Case No. 1:18-OP-45090

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*

Case No. 17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**NOTICE OF SERVICE OF MANUFACTURER DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT
FOR PLAINTIFFS' FAILURE TO OFFER PROOF OF CAUSATION**

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719, Manufacturer Defendants (as defined in Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation) hereby provide notice that on June 28, 2019, they served unredacted copies of the following documents on all Parties, the Court, and the Special Masters:

- Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;
- Memorandum In Support Of Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;
- Declaration of Timothy W. Knapp in Support of Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation, along with Exhibits 1 to 15
- [Proposed] Order Granting Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation;

- Summary Sheet for Manufacturer Defendants' Motion For Summary Judgment For Plaintiffs' Failure To Offer Proof Of Causation (also attached hereto as Exhibit A).

Dated: June 28, 2019

Respectfully submitted,

/s/ Mark S. Cheffo

Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036
Tel: (212) 698-3500
Mark.Cheffo@dechert.com

*Counsel for Defendants Purdue Pharma L.P.,
Purdue Pharma Inc., and The Purdue Frederick
Company*

*Co-Liaison Counsel for the Manufacturer
Defendants¹*

/s/ Carole S. Rendon

Carole S. Rendon
BAKER & HOSTETLER LLP
Key Tower 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 621- 0200
Fax: (216) 696-0740
crendon@bakerlaw.com

*Counsel for Defendants Endo Health Solutions Inc.
and Endo Pharmaceuticals Inc.; Par
Pharmaceutical, Inc., and Par Pharmaceutical
Companies, Inc.*

Co-Liaison Counsel for the Manufacturer Defendants

¹ Teva Pharmaceutical Industries Ltd., Allergan plc f/k/a Actavis plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their pending motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion as a result of the Court's deadline to file dispositive and Daubert motions, and, thus, they do not waive and expressly preserve their pending personal jurisdiction challenges.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of June 2019, the foregoing was served upon all counsel of record via email.

/s/ Donna M. Welch
Donna M. Welch, P.C.
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Tel: (312) 862-2000
donna.welch@kirkland.com